To: Godsey, Cindi[Godsey.Cindi@epa.gov]

From: Shaw, Hanh

**Sent:** Fri 4/25/2014 4:23:09 PM

**Subject:** Re: cigp 11/22/11

That is not an easy task to sort out. Good luck!

From: Godsey, Cindi

Sent: Friday, April 25, 2014 9:01:42 AM

To: Shaw, Hanh; Cool, Richard Subject: RE: cigp 11/22/11

That, of course, is possible but the one DMR that I looked at proves that is not the case all the time. In looking at the information, it seems strange that some months facilities submit DMRs for all their outfalls but other months, they don't.

Cindi

From: Shaw, Hanh

**Sent:** Friday, April 25, 2014 7:38 AM **To:** Godsey, Cindi; Cool, Richard

**Subject:** Re: cigp 11/22/11

Another way to look at the coding v. reporting issue is while facilities requested coverage for multiple outfalls, they may only discharge from just a few. So rather than submit no-discharge DMRs, they instead submit none?

From: Godsey, Cindi

Sent: Friday, April 25, 2014 8:30:43 AM

**To:** Shaw, Hanh; Cool, Richard **Subject:** RE: cigp 11/22/11

Hanh,

Port Graham made a comment during a consultation meeting that there were over 5000 violations of the permit and they were wondering how we could go on with business as usual. I am trying to put together a consultation close out letter so I am hunting through violation reports.

In the process, I am finding a ton of non-reporting violations because it looks like facilities may be coded for more discharges than they were authorized, thus figuring out which discharges are covered may result in some of those violations not actually being violations. Of course, in looking at one DMR yesterday, one outfall that was showing up as a non-report was reported with the rest of the DMR – just not entered as being received.

Cindi

From: Shaw, Hanh

**Sent:** Friday, April 25, 2014 6:58 AM **To:** Cool, Richard; Godsey, Cindi

**Subject:** Re: cigp 11/22/11

Hi all,

I am not exactly sure what you guys are looking for, but the file Rick sent was my attempt to document the outfalls requested for discharge from the NPDES permit applications submitted prior to the 2007 GP issuance and subsequently authorized for discharge.

The table does not reflect information from the NOIs or applications submitted requesting admin extension coverage.

Hanh

From: Cool, Richard

Sent: Friday, April 25, 2014 6:57:52 AM

To: Godsey, Cindi Cc: Shaw, Hanh

**Subject:** FW: cigp 11/22/11

Cindi:

I went through my emails and could not locate any emails from Hanh that discussed this coding sheet.

I believe I got it in the February-March 2013 time frame when I was trying to figure out anomalies on authorizations and DMR submissions for Hilcorp's Monopod and Granite Point Platforms.

So per yesterday's conversation, I don't think I have an outstanding question or inquiry that I need to respond to further. If there is something more you need please let me know.

Rick

From: Cool, Richard

Sent: Thursday, April 24, 2014 4:13 PM

To: Godsey, Cindi Cc: Shaw, Hanh Subject: cigp 11/22/11 Importance: High

Here is the document that I think I got from Hanh when I was trying to figure out some Hilcorp platform authorization issues. This was in my F drive folder for Cook Inlet GP so would have to go searching for the Hanh email if she sent it to me via email. I might have gotten this in hard copy from her and saved it.

If she sees this email maybe she could confirm the document's authenticity. I believe this was the document that was given to our NCU data folk.